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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

APR 18 2017

SEAN F. McAVOY, CLERK DEPUTY
SPOKANE, WASHINGTON

7 UNITED STATES DISTRICT
8 FOR THE EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,

10 16-CR-00063-SMJ

11 Plaintiff,

12 SECOND SUPERSEDING
13 INDICTMENT

14 ERIC J. PEREZ
(a.k.a. "Ignacio Valdez"),

15 18 U.S.C. § 2251(a),
Production of Child Pornography
(Counts 1 and 12)

16 Defendant.

17 18 U.S.C. § 2251(a),
Attempted Production of Child
18 Pornography
(Counts 5 and 7)

19 18 U.S.C. § 2422(b),
Coercion and Enticement of a Minor
20 to Engage in Criminal Sexual
Activity
(Counts 2, 6, 8, 9, 10, and 11)

21 18 U.S.C. § 1591(a)(1), (b)(1), (c),
Child Sex Trafficking
(Count 3)

22 18 U.S.C. §§ 1591(a)(2), (b)(1), (c),
and 1594, Attempted Child Sex
23 Trafficking
(Count 4)

18 U.S.C. § 2252A(a)(5)(B) –
Possession of Child Pornography
(Count 13)

**18 U.S.C. § 2253
Notice of Forfeiture Allegations**

The Grand Jury Charges:

COUNT 1

On or about January 27, 2015, through on or about October 15, 2015, within the Eastern District of Washington, Defendant ERIC J. PEREZ (a.k.a. "Ignacio Valdez") did knowingly employ, use, persuade, induce, entice, and coerce J.C., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate commerce and using materials that have been mailed, shipped, and transported in and affecting interstate commerce by any means, including by computer, all in violation of 18 U.S.C. § 2251(a), (e).

COUNT 2

On or about January 27, 2015, 2015, through on or about October 15, 2015, in the Eastern District of Washington, Defendant ERIC J. PEREZ (a.k.a. "Ignacio Valdez"), using a facility and means of interstate and foreign commerce, did knowingly attempt to persuade, induce, entice and coerce J.C., an individual who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, all in violation of 18 U.S.C. § 2422(b).

COUNT 3

On or about July 23, 2015, through on or about August 15, 2015, in the Eastern District of Washington, Defendant ERIC J. PEREZ (a.k.a. "Ignacio Valdez"), in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited J.C., a 13 year-old girl, knowing and in reckless disregard of the fact that J.C. had not attained the age of 14 years and would be caused to engage in a commercial sex act, after having a reasonable opportunity to observe Victim A, all in violation of 18 U.S.C. § 1591(a)(1), (b)(1), (c).

COUNT 4

On or about July 23, 2015, through on or about August 15, 2015, in the Eastern District of Washington, Defendant ERIC J. PEREZ (a.k.a. "Ignacio Valdez") knowingly attempted to benefit financially and by receiving a thing of value from participation in a venture that had, in and affecting interstate commerce, engaged in the recruitment, enticement, harboring, transporting, providing, obtaining, advertising, maintaining, patronizing, and soliciting of J.C., knowing and in reckless disregard of the fact that J.C. had not attained the age of 14 years and would be caused to engage in a commercial sex act, all in violation of 18 U.S.C. § 1591(a)(2), (b)(1), and 1594(a).

COUNT 5

On or about July 22, 2015, within the Eastern District of Washington, Defendant ERIC J. PEREZ (a.k.a. "Ignacio Valdez") did knowingly attempt to employ, use, persuade, induce, entice, and coerce A.G., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means

1 and facility of interstate commerce and using materials that have been mailed, shipped,
2 and transported in and affecting interstate commerce by any means, including by
3 computer, all in violation of 18 U.S.C. § 2251(a), (e).
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5 COUNT 6
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7 On or about July 22, 2015, through on or about July 31, 2015, in the Eastern
8 District of Washington, Defendant ERIC J. PEREZ (a.k.a. "Ignacio Valdez"), using a
9 facility and means of interstate and foreign commerce, did knowingly attempt to
10 persuade, induce, entice and coerce A.G., an individual who had not attained the age of
11 18 years, to engage in sexual activity for which any person can be charged with a
12 criminal offense, all in violation of 18 U.S.C. § 2422(b).
13

14 COUNT 7
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16 On or about July 21, 2015, within the Eastern District of Washington, Defendant
17 ERIC J. PEREZ (a.k.a. "Ignacio Valdez") did knowingly attempt to employ, use,
18 persuade, induce, entice, and coerce H.B., a minor, to engage in sexually explicit
19 conduct for the purpose of producing a visual depiction of such conduct, knowing and
20 having reason to know that such visual depiction would be transmitted using any means
21 and facility of interstate commerce and using materials that have been mailed, shipped,
22 and transported in and affecting interstate commerce by any means, including by
23 computer, all in violation of 18 U.S.C. § 2251(a), (e).
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25 COUNT 8
26

27 On or about July 21, 2015, in the Eastern District of Washington, Defendant
28 ERIC J. PEREZ (a.k.a. "Ignacio Valdez"), using a facility and means of interstate and
foreign commerce, did knowingly attempt to persuade, induce, entice and coerce H.B.,
an individual who had not attained the age of 18 years, to engage in sexual activity for

which any person can be charged with a criminal offense, all in violation of 18 U.S.C. § 2422(b).

COUNT 9

On or about October 9, 2015, through on or about November 13, 2015, in the Eastern District of Washington, Defendant ERIC J. PEREZ (a.k.a. "Ignacio Valdez"), using a facility and means of interstate and foreign commerce, did knowingly attempt to persuade, induce, entice and coerce S.D., an individual who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, all in violation of 18 U.S.C. § 2422(b).

COUNT 10

On or about January 4, 2015, through on or about March 10, 2016, in the Eastern District of Washington, Defendant ERIC J. PEREZ (a.k.a. "Ignacio Valdez"), using a facility and means of interstate and foreign commerce, did knowingly attempt to persuade, induce, entice and coerce B.H., an individual who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, all in violation of 18 U.S.C. § 2422(b).

COUNT 11

On or about March 12, 2015, through on or about April 8, 2016, in the Eastern District of Washington, Defendant ERIC J. PEREZ (a.k.a. "Ignacio Valdez"), using a facility and means of interstate and foreign commerce, did knowingly attempt to persuade, induce, entice and coerce M.H., an individual who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, all in violation of 18 U.S.C. § 2422(b).

1 COUNT 12
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3 On or about February 14, 2014, within the Eastern District of Washington and
4 elsewhere, Defendant ERIC J. PEREZ (a.k.a. "Ignacio Valdez") did knowingly employ,
5 use, persuade, induce, entice, and coerce D.P., a minor, to engage in sexually explicit
6 conduct for the purpose of producing a visual depiction of such conduct, knowing and
7 having reason to know that such visual depiction would be transmitted using any means
8 and facility of interstate commerce and using materials that have been mailed, shipped,
9 and transported in and affecting interstate commerce by any means, including by
10 computer, all in violation of 18 U.S.C. § 2251(a), (e).

11
12 COUNT 13

13 On or about February 14, 2014, through on or about April 14, 2016, within the
14 Eastern District of Washington, Defendant ERIC J. PEREZ (a.k.a. "Ignacio Valdez")
15 did knowingly possess material which contained one or more visual depictions of child
16 pornography, as defined in 18 U.S.C. § 2256(8)(A), the production of which involved
17 the use of a minor engaging in sexually explicit conduct, and which visual depictions
18 were of such conduct; that has been mailed, shipped and transported in interstate and
19 foreign commerce, and which was produced using materials which had been mailed,
20 shipped, or transported in interstate and foreign commerce, by any means including
21 computer, all in violation of 18 U.S.C. § 2252A(a)(5)(B).

22
23 NOTICE OF CRIMINAL FORFEITURE
24

25 Upon conviction of the offense alleged in Counts 1 or 12 of this Second
26 Superseding Indictment, Defendant ERIC J. PEREZ (a.k.a. "Ignacio Valdez") shall
27 forfeit to the United States, pursuant to 18 U.S.C. § 2253, any visual depiction
28 described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any
book, magazine, periodical, film, videotape, or other matter which contains any such

1 visual depiction, which was produced, transported, mailed, shipped or received in
2 violation of this chapter; any property, real or personal, constituting or traceable to
3 gross profits or other proceeds obtained from such offenses; and, any property, real or
4 personal, used or intended to be used to commit or to promote the commission of such
5 offenses, or any property traceable to such property, including but not limited to:

- 6 1) one Hewlett-Packard laptop computer;
- 7 2) one JVC camcorder;
- 8 3) one Apple MacBook Pro laptop computer;
- 9 4) one Toshiba external hard drive;
- 10 5) three Samsung cellular phones; and
- 11 6) one black Motorola cellular phone.

13 If any of the above described forfeitable property, because of any act or omission
14 of the Defendant:

- 15 (a) cannot be located upon the exercise of due diligence;
- 16 (b) has been transferred or sold to, or deposited with, a third party;
- 17 (c) has been placed beyond the jurisdiction of the court;
- 18 (d) has been substantially diminished in value; or
- 19 (e) has been commingled with other property which cannot be divided without
20 difficulty;

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1 it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated
2 by 18 U.S.C. § 2253(b), to seek forfeiture of any other property of said Defendant
3 up to the value of the forfeitable property described above.
4

5 DATED this 18th day of April, 2017.

6 A TRUE BILL

7
8 Foreperson

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11 JOSEPH H. HARRINGTON

12 Acting United States Attorney

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14 Scott T. Jones
15 Assistant United States Attorney

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